

COPY

**IN THE CIRCUIT COURT OF HENRY COUNTY, TENNESSEE
FOR THE TWENTY-FOURTH JUDICIAL DISTRICT AT PARIS**

RICKY MICHAEL,

Plaintiff,

Vs.

DOCKET NO. 4125

**BLUECROSS BLUESHIELD
OF TENNESSEE, INC.**

Defendant.

COMPLAINT

Comes now the Plaintiff, Ricky Michael, by and through his attorney, and would state and show to this most Honorable Court as follows:

1. Plaintiff is a citizen and resident of Henry County, Tennessee and resides at 123 Mizgah Street, Springville, Tennessee 38256.
2. Defendant is a Tennessee Corporation with its principal office being located at Corporate Governance Department, 1 Cameron Hill Circle, Chattanooga, Tennessee 37402-9815.
3. That Plaintiff had entered into a contract with the Defendant to provide certain health care benefits. Said Plaintiff's Reference Number is 182420018002, Group Number 132641.
4. Defendant, hereinafter being referred to "BlueCross BlueShield of Tennessee".
5. That Plaintiff had satisfied his medical insurance premiums by and through payroll deduction from his employer, mainly, Beacon Transport, LLC.
6. Plaintiff's last employment check referencing the medical insurance premium deductions was May 4, 2018.

Exhibit "A"

FILED 1-28-2021 AT 3:20 A.M.
MIKE WILSON, CLERK
BY *[Signature]*

7. The Plaintiff, on or about May 1, 2018, suffered complications with his heart and was ultimately treated at Saint Thomas Hospital in Nashville, Tennessee.

8. Plaintiff received treatment including, but not limited to, beginning May 1, 2018 and continuing through May 17, 2018.

9. That Plaintiff has incurred medical expenses in excess of \$67, 699.79.

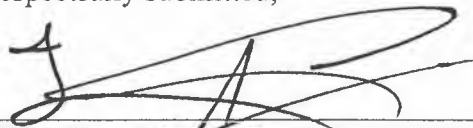
10. That the Defendant, BlueCross BlueShield of Tennessee, has willfully failed and refused to satisfy said medical expenses as per the contract entered into between the parties.

11. That Plaintiff has incurred attorney's fees to enforce said contract.

WHEREFORE, Plaintiff sues the Defendant in the amount of \$67,699.79 plus bad faith penalties for all of which he sues.

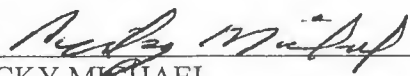
This the 28 day of January, 2021.

Respectfully submitted,


TERRY J. LEONARD BPR #011851
ATTORNEY AT LAW
100 South Forrest Avenue
PO Box 130
Camden, TN 38320
(731) 584-0354
Attorney for Plaintiff

COST BOND

We hereby acknowledge ourselves as surety in the above matter for cost in an amount not to exceed \$1,000.00.


RICKY MICHAEL


TERRY J. LEONARD

**STATE OF TENNESSEE
COUNTY OF BENTON**

I, **RICKY MICHAEL**, after first being duly sworn according to law, make oath that I have read the foregoing Complaint and that my Complaint is true, to the best of my knowledge, information and belief, and that my Complaint is not made out of levity, or by collusion with the Defendant, but in sincerity and truth for the causes mentioned therein.

This the 28 day of January, 2021.

Ricky Michael
RICKY MICHAEL

SWORN TO and SUBSCRIBED before me this the 28 day of January, 2021.

Amy Ballard
NOTARY PUBLIC

My Commission Expires: 5/11/21

